

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

BLUE CROSS AND BLUE SHIELD OF)	
KANSAS CITY,)	
)	
Plaintiff,)	Case No. 21-cv-00525
)	
v.)	
)	
GS LABS LLC,)	
)	
Defendant.)	

JOINT STATUS REPORT AND MOTION TO EXTEND DEADLINES

COME NOW, Blue Cross and Blue Shield of Kansas City (“Blue KC”) and GS Labs, LLC (“GS Labs” or collectively “the Parties”), by and through their undersigned counsel, and submit their Joint Status Report pursuant to the Court’s Order of April 8, 2022 (Doc. No. 213) along with a corresponding Motion to Extend Deadlines.

On April 1, 2022, the Parties advised the Court that they were in the process of negotiating a resolution of this matter (Doc. No. 210). Since then, the Parties have exchanged numerous communications and datasets in an effort to reach a mutually acceptable settlement. Although the Parties have made significant progress, the Parties have not yet reached a binding settlement agreement. The Parties continue to work together to explore settlement.

In order to accommodate the Parties’ mutual interest in reaching a final negotiated resolution of this litigation and in the interests of judicial economy, the Parties request an additional thirty-day extension of all remaining deadlines in this litigation. The request for extension of deadlines is sought to allow the Parties opportunity to explore potential settlement and, if settlement is reached, draft appropriate settlement documents. The Parties respectfully suggest that the Court consider this progress toward settlement as good cause warranting the requested extension of time.

The Parties jointly propose existing deadlines be amended as follows:

	Existing Deadline	Proposed Deadline
Close of Discovery	July 15, 2022	August 15, 2022
Motion for summary judgment	August 15, 2022	September 14, 2022
Rebuttal Reports	July 1, 2022	August 1, 2022
Expert Challenges/Daubert Motions	August 15, 2022	September 14, 2022
Status Report	June 1, 2022	July 1, 2022

WHEREFORE, Blue KC and GS Labs respectfully request that all deadlines in this matter, including Blue KC's deadline to respond to pending motions, be extended by thirty (30) days as described in greater detail above and for all further relief the Court believes is warranted under the circumstances.

Respectfully submitted,

CAPES, SOKOL, GOODMAN & SARACHAN, P.C.

By: /s/ Aaron E. Schwartz

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on all parties of record by emailing counsel of record this 27th day of May, 2022.

/s/ Aaron E. Schwartz